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UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

In Re:

SHUMATE SPOKANE, LLC.,

Debtor.

NO. 09-05081-FLK 11

MOTION FOR ORDER
SHORTENING TIME

Shumate Spokane, LLC ("Shumate Spokane"), as debtor and debtor in possession (the "Debtor"), by and through its undersigned counsel, hereby moves pursuant to LBR 2002-1(c)(2) for an order Shortening Time to 17 days for responses and/or objections to the Amended Motion of Debtor to (1) Sell Certain Assets to Stalking Horse Bidder or Other Successful Bidder at Auction Free and Clear of Liens, Claims, Interests and Other Encumbrances, (2) To Assume and Assign or Reject Certain Leases In Connection with the Sale and (3) To Terminate Certain Dealership Agreement.

The grounds for this Motion are that Debtor has entered into an Asset Purchase Agreement with a, Stalking Horse purchaser, Seven

Oaks Motor Sports LLC for the sale of the operating assets of Debtor and the motor sports dealership of Debtor. Debtor filed its Amended Motion for approval of the sale to Seven Oaks or a higher bidder and related relief. Debtor has set a Bid Deadline of May 14, 2010 for other prospective purchasers and an Auction for May 21, 2010. In order to preserve the going concern value of the Debtor's business, to maximize the return to creditors from the sale and take full advantage of the fair weather selling season Debtor seeks approval to complete any sale as soon as possible. Further Debtor believes it is in the best interests of all parties if the matter can be heard before scheduled court hearings on various stay relief motions brought by secured creditors against the Shumate entities now scheduled to begin May 25th, 2010. Accordingly, Debtor believes it is important and in the best interests of the estate to obtain approval of the sale and obtain related relief as soon as possible.

Wherefore, Debtor prays for an Order Shortening Time to 17 days for responses and/or objections to the Amended Motion of Debtor to (1) Sell Certain Assets to Stalking Horse Bidder or Other Successful Bidder at Auction Free and Clear of Liens, Claims, Interests and Other Encumbrances, (2) To Assume and Assign or Reject Certain Leases In Connection with the Sale and (3) To Terminate Certain Dealership Agreement.

DATED this 30th day of April, 2010.

EWING ANDERSON, P.S.

/s/ David E Eash

By: _____
DAVID E. EASH WSBA #6684
Attorneys for Debtor

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